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November 30, 2022

VIA ELECTRONIC FILING

Office of Engineering and Technology
Experimental Licensing Branch
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Donna A. Balaguer
Principal
Balaguer@fr.com
202 626 7719 direct

Re: Parable Broadcasting Company, LLC
ELS File No. 0937-EX-CN-2022
Reference No. 73366

To Whom It May Concern:

On September 19, 2022, Parable Broadcasting Company, LLC (“Parable”) submitted the above-referenced application for an experimental radio license. Given that Parable proposes to experiment with novel technology and applications, it submitted a customary confidentiality request, including requesting confidentiality for the exhibit described as “Purpose of the Experiment.” Shortwave Solutions LLC (“SSL”) filed an Informal Objection objecting to confidentiality of the exhibit. In order to avoid delays in processing the application, and without waiving any of its rights, Parable hereby submits the attached redacted version of the exhibit to be made publicly available (while the originally submitted, non-redacted version should remain confidential pursuant to the confidentiality request).

The attached submission resolves SSL’s objection. However, Parable notes that SSL claims that the experimental application and an application Parable filed in the International High Frequency (“IHF”) Service in 2020 are “intrinsically related.” This is not true. As stated in the attached exhibit, neither application is dependent on the grant or denial of the other.¹ The experimental application should be reviewed on its face in the normal course. It is telling, however, that in the IHF proceeding, SSL stated, “[SSL] hereby discloses affiliation with one of Part 5 applicants for experimental license for similar services and, as such, affiliation with a competitor of Parable.”² The Commission clearly does not, and should not in the instant case, take into account the anti-competitive motives of self-proclaimed competitors when reviewing experimental applications.

¹ Further, SSL references other IHF applications filed by unrelated parties that have no bearing on Parable’s application.

² Informal Objection of Shortwave Solutions, LLC, IHF-C/P-20200427-00001, filed August 28, 2020, p. 3 (emphasis in original).



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Please contact the undersigned with any questions.

Sincerely,

/s/ Donna A. Balaguer
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Counsel to Parable Broadcasting Company, LLC

Encl.



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CERTIFICATE OF SERVICE

I, Donna Balaguer, hereby certify that a copy of the foregoing Response to Informal Objection has been served by electronic delivery (via the only contact information provided in the Informal Objection) on November 30, 2022, on the following:

Alex Pilosov
Shortwave Solutions LLC
alex@shortwave-solutions.com

By: /s/ Donna A. Balaguer
Donna A. Balaguer

DESCRIPTION OF THE PROPOSED EXPERIMENT

Parable Broadcasting Company, LLC (“Parable”) hereby requests authority to conduct an experiment using advanced technologies for data transmission in the high frequency range. Parable proposes to conduct a market trial, limited in scope as set forth below [REDACTED]. This exhibit describes how the experiment and market trial have a reasonable promise of contribution to the development, extension, expansion, or utilization of the radio art.

Proposed Scope of Experiment

Parable proposes to transmit content to a limited number of trial participants as explained below. The trial would support transmissions from points in the U.S. to points in [REDACTED]. In particular, Parable will experiment with the transmission of high throughput and/or low latency information using advanced [REDACTED] technology.

Parable seeks to engage trial participants to test the reception of these technologies. [REDACTED]

Market trial participants would be required to provide feedback on the reliability and value of the transmissions versus other sources of such information. Feedback might include, but not be limited to, quality of service, throughput, and latency. [REDACTED]

[REDACTED] The market trial will help Parable determine whether the technology and use case needs further refinement.

In April 2020, Parable applied for authority to construct an International High Frequency (“IHF”) broadcast station to transmit both audio and data content. [REDACTED]

[REDACTED] this experimental application is filed independently of the broadcast application and is not dependent on the outcome of the broadcast application. The requested experiment with market trial authority will provide valuable technical data on HF transmissions and advanced technologies. Further, the experiment will provide information on whether the technology could be multi-purposed for the [REDACTED]

Grant of the requested authority would enable Parable to pursue significant advancements in the development of the radio art and therefore would serve the public interest generally and the intent of the Commission’s Part 5 framework specifically.